

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW JERSEY <b>Caption in Compliance with D.N.J. LBR 9004-2(c)</b>	
<b>RABINOWITZ, LUBETKIN &amp; TULLY, LLC</b> 293 Eisenhower Parkway, Suite 100 Livingston, NJ 07039 (973) 597-9100 Jonathan I. Rabinowitz Barry J. Roy <i>Counsel for Jeffrey A. Lester, Chapter 7 Trustee</i>	
In re:	Case No. 19-13273 (VFP)
IMMUNE PHARMACEUTICALS INC., et al.,	Chapter 7
Debtors.	Jointly Administered

**NOTICE OF MOTION FOR ORDER  
AUTHORIZING THE CHAPTER 7 TRUSTEE TO SELL  
CERTAIN OF THE DEBTORS' REMAINING ASSETS  
FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS PURSUANT  
TO 11 U.S.C. § 363(b) AND (f) AND TO ASSUME AND ASSIGN CERTAIN  
EXECUTORY CONTRACTS PURSUANT TO 11 U.S.C. § 365(f)**

PLEASE TAKE NOTICE that on \_\_\_\_\_, 2020, at \_\_\_\_\_ .m. or as soon thereafter as counsel may be heard, Jeffrey A. Lester, Chapter 7 Trustee (the "Trustee") for Immune Pharmaceuticals, Inc. ("Immune Inc."), Immune Pharmaceuticals, Ltd. ("Immune Ltd."), Cytovia, Inc. ("Cytovia"), Immune Oncology Pharmaceuticals, Inc. ("Oncology"), Maxim Pharmaceuticals, Inc. ("Maxim"), and Immune Pharmaceuticals USA Corp. ("USA," collectively with the foregoing, the "Debtors"), by and through his counsel, Rabinowitz, Lubetkin & Tully, LLC, shall move before the Honorable Vincent F. Papalia, United States Bankruptcy Judge, at the United States Bankruptcy Court, MLK Jr. Federal Building, Courtroom 3B, 50 Walnut Street, Newark, New Jersey 07102, for an order authorizing the sale of certain of

the Debtors' remaining assets pursuant to 11 U.S.C. § 363(b) and (f) and to assume and assign certain executory contracts pursuant to 11 U.S.C. § 365(f).

**PLEASE TAKE FURTHER NOTICE** that in support of the Trustee's Motion, the undersigned shall rely on the Application and proposed form of order submitted simultaneously herewith.

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-2, no brief is being submitted as the relief requested by the Trustee is fact sensitive and the relevant facts and law are fully set forth in the supporting Application. Nonetheless, the Trustee reserves the right to submit a memorandum of law subsequent hereto if necessary.

**PLEASE TAKE FURTHER NOTICE** that oral argument is waived pursuant to D.N.J. LBR 9013-1(f) unless a timely objection is filed.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested by the Trustee shall: (i) be in writing; (ii) specify with particularity the basis of such objection; and (iii) be filed with the Clerk of the Bankruptcy Court, and simultaneously served on counsel for the Trustee, Rabinowitz, Lubetkin & Tully, LLC, 293 Eisenhower Parkway, Suite 100, Livingston, New Jersey 07039 (Attention: Jonathan I. Rabinowitz, Esq.). Objections shall be filed and served as ordered by the Court.

**PLEASE TAKE FURTHER NOTICE** that unless an objection is timely filed and served, the motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief may be granted without a hearing.

**RABINOWITZ, LUBETKIN & TULLY, LLC**  
*Counsel for Jeffrey A. Lester, Chapter 7 Trustee*

By: /s/ Jonathan I. Rabinowitz  
JONATHAN I. RABINOWITZ

Dated: October 8, 2020

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